

## Remarks

### *Claim Rejections – 35 USC § 103*

Pending claims 1-9, 18, 20 and 22 stand rejected under 35 USC 103(a), as being unpatentable over Sciacca (US 6,760,761) in view of Thompson et al. (US 6,189,038). This rejection is traversed in light of the following remarks.

1. **Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose “automatically generating ...an adaptive software interface”.**

In the Advisory Action of February 19, 2010, the Examiner argues that it is incorrect (of the Applicant) to assert that standardized interfaces are fixed interfaces. This is beside the point: Sciacca discloses that a “standard interface” (col.1, line 33) is presented to users and network managers. This is contrasted with the “different commands” which were necessary to configure different devices prior to the invention of Sciacca. The clear implication is that the standard interface of Sciacca is a fixed interface (because the problem of the prior art which is alleged to be solved was variation among different interfaces). In other words, the interface disclosed by Sciacca is both standardized and fixed.

The Examiner argues that “it would be fair to equate the standardization process as an adaptation process”. It is not known to what “standardization process” the Examiner is referring. The Examiner also proposes to define “standardization” as “the development of an agreed upon standard”. The Applicant is at a loss to guess how this relates to Sciacca. Sciacca discloses nothing about any “standardization process” or the “development... of a standard”. Therefore, following the Examiner’s own logic, it discloses nothing about an “adaptation process” either.

The Examiner argues that “it would be fair to equate the standardization process as an adaptation process”. The Examiner also proposes to define “standardization” as “the development of an agreed upon standard”. However, the verb “standardize” has at

least one other meaning, which is to normalize, or “bring into conformity with a standard” (see, e.g. <http://www.merriam-webster.com/dictionary/standardize>). Sciacca discloses nothing about the process of agreeing upon a standard; consequently, the Examiner’s interpretation is not supported by Sciacca. On the contrary, Sciacca does disclose that the device manager presents the user with a standard interface to the various managed devices – that is, the interface is brought into conformity with a standard, by the device manager. Thus, the Applicant’s interpretation of the meaning of “standardize” is supported by Sciacca.

The “standard” interface of Sciacca is specifically designed not to require “adaptation”. To equate the alleged “standardization” of Sciacca with an adaptation process is therefore completely contradictory to the teaching of Sciacca. Irrespective of the different possible dictionary definitions of “standard”, “standardize” and “standardization” and “specification”, the teaching of Sciacca to one of ordinary skill in the art is perfectly clear. In particular, there is no software interface which adapts to different entity interface capabilities, since the aim is quite the opposite, i.e. to use a single standard interface for controlling all network entities.

The Examiner alleges that Sciacca explains “how adaptations are made to the interface to work with different formats”. However, the passage cited by the Examiner in support of this allegation (col.9, lines 38-40) actually describes that the device configuration generator uses “table-driven technology” so that it can “quickly” adapt to emerging communication technologies. Adaptation of an interface is not disclosed. All that is disclosed is that tables can be updated when new devices and technologies emerge, so that these too can be controlled by the device manager via the same standard interface. In other words, the device manager is easily upgradeable, but the interface presented remains the same.

The Applicant therefore respectfully repeats that Sciacca cannot render claim 1 obvious, at least because Sciacca does not disclose “generating ...an adaptive software interface”.

Nonetheless, in the interests of advancing the prosecution of this application, claim 1 is amended to clarify that the method comprises:

"automatically generating ...an adaptive software interface;"

This removes any possible ambiguity that the claim might encompass some unspecified "standardization process" by which a standard is agreed upon, because such unspecified process of agreement is presumably not automated. It also further clarifies the distinction from Sciacca, because Sciacca does not disclose automatic adaptation of any kind, let alone automatic generation of an adaptive interface.

The amendment is based on the specification of the application as filed. That the generation of the interface is automatic is disclosed at p.15, lines 6-10 (at least).

**2. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "generating structured meta-data... describing a characteristic of an interface capability of each of a first entity and at least one other entity".**

The Examiner believes that Sciacca discloses the collection of meta-data describing the semantics of interfaces for the client-end devices (as well as the managed devices), which meta-data is then stored in the configuration database. (Paraphrasing the Examiner's Response to Arguments, final paragraph, in the final office action dated December 7, 2009.)

This mistaken belief was addressed in the Applicant's reply, filed January 20, 2010, which was entered by the Examiner. However, the advisory action of February 19 ignores the point.

In the office action of December 7, 2009, the Examiner cited col.5, lines 41-52 of Sciacca as basis for this belief that meta-data is generated and stored for the client-end devices.

In fact, this cited passage describes the input inspection engine 450 of the device configuration database 310. The engine "validates inputs from external entities". For example, it may perform checks to ensure that invalid data is not entered by an operator into the configuration database 420. Note that the data input into and stored in the configuration database is "configuration data corresponding to one or more managed devices" (col.5, lines 3-4). Since the data pertains to the managed devices, it is clearly not meta-data describing the interface of the client-end (remote) device. Therefore, (as explained in the Applicant's previous replies) Sciacca does not disclose the recited limitation of "generating structured meta-data providing at least one semantic information element describing a characteristic of an interface capability of each of a first entity and at least one other entity".

**3. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "collating the semantic information elements of said first entity where possible with corresponding semantic information elements of said at least one other entity".**

As explained above at 2, Sciacca does not disclose meta-data relating to the "other entity" (the client-end device, applying the Examiner's interpretation). Therefore, Sciacca cannot disclose "collating" semantic information elements provided in such meta-data.

**4. Sciacca cannot render claim 1 obvious at least because Sciacca does not disclose "automatically analysing said collated semantic information elements to establish the extent to which the interface capabilities of said entities are compatible".**

Since Sciacca does not disclose generating metadata or collating semantic information elements for any "other entity", it also cannot disclose "analysing" any such collated information elements.

Nevertheless, in the claims as currently amended, for the further avoidance of doubt and advancement of the proceedings, this claim limitation is clarified as:

"automatically analysing said collated semantic information elements".

The Applicant submits that this is even more clearly distinguished from Sciacca (as well as from any unspecified "standardization process" that the Examiner may have in mind).

The amendment is based on the description in the application as filed. That the analysis of semantic information is automatic is disclosed at p.40, which makes clear that the analysis can be performed at run-time by an initiator, responder, or intermediary software application.

The foregoing remarks show that Sciacca fails to disclose each of the recited limitations in claim 1 which it was alleged by the Examiner to disclose. Thompson does nothing to remedy these deficiencies. Accordingly, the Examiner has failed to make a prima facie case demonstrating the obviousness of claim 1 in light of these two references.

### **Independent claims 8, 18, and 20**

Corresponding amendments have been made to claims 8, 18, and 20. For brevity, the arguments will not be repeated again. Of the arguments made above relating to the patentability of claim 1:

- Numbered points 2 to 4 apply equally to claim 8;
- All of points 1 to 4 apply identically to claim 18;
- Likewise, all four points apply identically to claim 20.

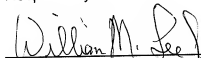
Claims 8, 18, and 20 are allowable for at least these reasons.

The remaining dependent claims are submitted to be allowable at least by virtue of their dependence from an allowable independent claim.

In view of the fact that all of the Examiner's comments have been addressed, further and favorable reconsideration is respectfully requested.

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William M. Lee, Jr.", is written over a horizontal line.

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